

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

|                              |   |                         |
|------------------------------|---|-------------------------|
| _____                        | ) |                         |
| MELISSA SEPPI,               | ) |                         |
| Plaintiff,                   | ) |                         |
|                              | ) | C.A. NO.: 03CV12493 RCL |
| v.                           | ) |                         |
|                              | ) |                         |
| MEZZANOTTE, LLC d/b/a VISION | ) |                         |
| NIGHTCLUB and FRANK C. AMATO | ) |                         |
| Defendants.                  | ) |                         |
| _____                        | ) |                         |

**DEFENDANTS MEZZANOTTE, LLC d/b/a VISION NIGHTCLUB AND FRANK  
C. AMATO'S INITIAL DISCLOSURES**

Pursuant to Fed. R. Civ. P 26(a)(1), Defendants Mezzanotte, LLC d/b/a Vision Nightclub and Frank C. Amato make the following disclosures based on information reasonably available to them at this time. Defendants reserve the right to supplement or revise these disclosures if and when additional information becomes available.

The defendants' initial disclosures are made without waiving in any way (1) the right to object on the grounds of competency, privilege, relevancy, materiality, hearsay or any other proper grounds, to the use of such information, for any purpose in whole or in part, in any subsequent proceeding in this action, and (2) the right to object on any ground, at any time, to any other discovery request or proceeding involving or relating to the subject matter of these disclosures. All of the disclosures set forth below are made subject to the above objections.

**A. The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.**

The following individuals are likely to have discoverable information relevant to the disputed facts alleged in the complaint. The defendants reserve the right to supplement and revise its disclosures after further discovery.

1. Josh Spitalieri  
44 Meadow Street  
Beverly, MA  
(978) 375-1447  
DJ at Vision's nightclub who knew the plaintiff.
2. Meghan Putnam  
Driver of vehicle in accident alleged in the complaint.
3. Melissa Seppi
4. Margaret Doherty  
Friend of plaintiff's that was interviewed by the police and stated she had attended the Nightclub with the plaintiff prior to the accident alleged in the complaint.
5. Sarah Walsh  
Friend of plaintiff's that was interviewed by the police and stated she had attended the Nightclub with the plaintiff prior to the accident alleged in the complaint.
6. Jenny Entrican  
Friend of plaintiff's that was interviewed by the police and stated she had attended the Nightclub with the plaintiff prior to the accident alleged in the complaint.
7. Frank Amato  
Owner of Nightclub.
8. Greg Krochmal  
Manager and Head of Security at the Nightclub.
9. Christine Aylwim  
Head Bartender at the Nightclub.

10. Michael Maly  
Part-time Front Doorman at the Nightclub.
11. Renee Oliveira  
Cashier and Office Manager at the Nightclub.
12. Mark Ryan Bergeron  
Inside Security at Nightclub.
13. Richard T. Brown  
Inside Security at Nightclub.
14. Nichol Resca  
Cocktail Waitress at Nightclub in November 2001.
15. Kimberly J. Miles  
Bartender at the Nightclub.
16. Vinny Procoplo  
Friend of Josh Spitaleri who allegedly met Putnam and Seppi and the  
Nightclub on the night of the accident alleged in the complaint.

**B. A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.**

1. Accident Report
2. Accident Reconstruction Report done by State Police.

**C. A computation of any category of damages claimed by the disclosing party, making available for inspection and copying.**

Not applicable to this defendant.

**D. For inspection and review any insurance agreement under which any person carrying on as an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

Defendants will disclose a copy of the defendant's insurance policy.

Defendants  
Mezzanotte, LLC d/b/a Vision  
Nightclub and Frank C. Amato  
By their attorneys,

/s/ John A. Donovan, Jr.

/s/ Kevin G. Kenneally

John A. Donovan, Jr.

BBO No. 130600

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Dated: April 14, 2004

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